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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**FORTIETH MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD JANUARY 1, 2023 THROUGH JANUARY 31, 2022**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>January 1, 2023 through January 31, 2023</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$326,985.60 (80% of \$408,732.00)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$38,002.31 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this fortieth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing January 1, 2023 through January 31, 2022 (the “**Application Period**”).

#### **Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$408,732.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$326,985.60.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$867.67. The blended hourly rate of paraprofessionals during the Application Period is \$326.09.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$6,882.31 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$6,882.31.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$31,120.00. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

**FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

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WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$326,985.60 (80% of \$408,732.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$38,002.31 (100%), for a total amount of \$364,987.91 for the Application Period.

Dated: March 13, 2023  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants.*

**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A004	Case Administration	3.3	\$742.50
A008	Hearings	1.2	\$1,740.00
A009	Meetings / Communications with AHC & Creditors	8.1	\$12,630.00
A015	Non-Working Travel (Billed @ 50%)	22.7	\$11,048.50
A019	Plan / Disclosure Statement	2.0	\$3,900.00
A020	Insurance Adversary Proceeding	466.1	\$378,671.00
		<b>503.4</b>	<b>\$408,732.00</b>

**Exhibit B**

**Summary of Compensation by Professional**



Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate <sup>2</sup>	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Special Counsel / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,950	4.8	\$9,360.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,600	13.4	\$21,440.00
Richard Leveridge	Partner / State of New York – 1997 District of Columbia – 1981 U.S. Court of Appeals for the District of Columbia – 1981 U.S. District Court for the District of Columbia – 1982 U.S. Supreme Court - 1986 U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the E. D. of New York – 1988 U.S. District Court for the S. D. of New York - 1998 U.S. District Court for the District of Maryland – 2000 U.S. Court of Appeals for the Second Circuit - 2020	\$1,600	35.6	\$56,960.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,450	2.3	\$3,335.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$1,000 \$500 <sup>3</sup>	102.2 20.9	\$102,200.00 \$10,450.00
Jon Dougherty	Of Counsel / State of New York – 2014 U.S. District Court for the S. D. of New York – 2014 District of Columbia – 2016 U.S. District Court for District of Wisconsin – 2017 U.S. Bankruptcy Court for the S. D. of New York – 2022	\$825	12.2	\$10,065.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$825	64.0	\$52,800.00

<sup>2</sup> Gilbert's hourly rates are reviewed from time to time and are subject to periodic adjustment. In the ordinary course of Gilbert's business and in keeping with the firm's established billing procedures, Gilbert adjusted its standard billing rates effective as of January 1, 2023.

<sup>3</sup> Non-working travel is billed @ 50% of regular hourly rates.

<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate<sup>2</sup></b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Adam Farra	Associate / State of Maryland – 2011 U.S. District Court for the District of Maryland – 2013 District of Columbia – 2015 U.S. Court of Appeals for the Second Circuit - 2017	\$775	9.0	\$6,975.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$725	57.3	\$41,542.50
Alison Gaske	Associate / District of Columbia – 2016	\$665 \$332.50 <sup>4</sup>	59.8 1.8	\$39,767.00 \$598.50
Ethan Kaminsky	Associate / State of New York – 2018 U.S. Court of Appeals for the Second Circuit – 2018 U.S. District Court for the S. D. of New York - 2019 Second Circuit Court of Appeals – 2020	\$665	3.5	\$2,327.50
Janet Sanchez	Associate / Commonwealth of Virginia – 2020 District of Columbia - 2022	\$525	11.3	\$5,932.50
Ifenanya Agwu	Associate / District of Columbia – 2022	\$525	44.3	\$23,257.50
December Huddleston	Associate / District of Columbia – 2021	\$525	9.2	\$4,830.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$500	9.7	\$4,850.00
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator – Joined firm in 2018	\$400	2.3	\$920.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$350	1.2	\$420.00
Nick Poz	Paralegal – Joined firm in 2022	\$350	14.5	\$5,075.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$265	5.1	\$1,351.50
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$225	19.0	\$4,275.00
	<b>Totals</b>		<b>503.4</b>	<b>\$408,732.00</b>
	<b>Attorney Blended Rate</b>	<b>\$867.67</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$326.09</b>		

<sup>4</sup> Non-working travel is billed @ 50% of regular hourly rates.

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Contracted Professional Fees – Litigation Support Vendors	\$1,142.82
Depositions / Transcripts	\$4,063.43
Messenger & Delivery	\$55.85
Travel – Lodging	\$557.28
Travel – Meals	\$88.61
Travel – Mileage	\$405.63
Travel – Parking	\$43.08
Travel – Tolls	\$9.61
Travel – Train Fare	\$516.00
<b>Total</b>	<b>\$6,882.31</b>

**Exhibit D**

**Summary of Expenses Incurred and Not Yet Paid**

**SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Insurance Consulting Expert A	\$31,120.00
<b>Total</b>	<b>\$31,120.00</b>

**Exhibit E**

**Time and Expense Detail**



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Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

February 22, 2023  
Invoice Number: 11329434  
Client Number: 1599  
Tax ID: 52-2283869

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**FOR PROFESSIONAL SERVICES RENDERED through January 31, 2023**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	408,732.00	6,882.31	415,614.31
<b>Total</b>	<b>408,732.00</b>	<b>6,882.31</b>	<b>415,614.31</b>

TOTAL FEES \$ 408,732.00

TOTAL EXPENSES \$ 6,882.31

**TOTAL FEES AND EXPENSES \$ 415,614.31**



**FOR PROFESSIONAL SERVICES RENDERED through January 31, 2023**

**Purdue Bankruptcy**

**A004: Case Administration**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Turner, C.	1/03/23	Review court docket for recently filed insurance-related pleadings.	.70	157.50
Turner, C.	1/09/23	Review bankruptcy court docket for insurance-related pleadings recently filed.	.90	202.50
Turner, C.	1/17/23	Review court docket for recently filed insurance-related pleadings.	.80	180.00
Turner, C.	1/23/23	Review court docket for recently filed insurance-related pleadings.	.90	202.50
<b>Project Total:</b>			<b>3.30</b>	<b>\$ 742.50</b>

**A008: Hearings**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Quinn, K.	1/24/23	Participate in omnibus hearing.	1.20	1,740.00
<b>Project Total:</b>			<b>1.20</b>	<b>\$ 1,740.00</b>

**A009: Meetings / Communications with AHC & Creditors**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	1/17/23	Confer with AHC working group re strategy.	.50	975.00
Gilbert, S.	1/25/23	Confer with AHC re status.	1.10	2,145.00
Quinn, K.	1/25/23	Participate in update with client.	1.10	1,595.00
Shore, R.	1/25/23	Review insurance adversary status (0.9); confer with client re litigation strategy (1.1).	2.00	3,200.00
Rubinstein, J.	1/25/23	Review insurance litigation status in preparation for call with client (0.4); confer with client re litigation status and strategy (1.1).	1.50	1,500.00
Leveridge, R.	1/25/23	Review report to AHC working group re insurance case (0.3); attend AHC meeting (1.1).	1.40	2,240.00
Gilbert, S.	1/31/23	Confer with AHC working group re status.	.50	975.00
<b>Project Total:</b>			<b>8.10</b>	<b>\$ 12,630.00</b>

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**A015: Non-Working Travel (Billed @ 50%)**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Rubinstein, J.	1/09/23	Travel from Washington, DC to Stamford, CT for deposition.	5.50	2,750.00
Rubinstein, J.	1/10/23	Travel from Stamford, CT to Washington, DC after deposition.	5.50	2,750.00
Gaske, A.	1/11/23	Travel from Washington, DC to New York, NY for deposition.	1.80	598.50
Rubinstein, J.	1/12/23	Travel (roundtrip) from Washington, DC to New York, NY to attend deposition.	9.90	4,950.00
<b>Project Total:</b>			<b>22.70</b>	<b>\$ 11,048.50</b>

**A019: Plan / Disclosure Statement**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	1/23/23	Confer with Debtors' counsel and AHC working group re company status (1.2); confer with Debtors' counsel re same (0.8).	2.00	3,900.00
<b>Project Total:</b>			<b>2.00</b>	<b>\$ 3,900.00</b>

**A020: Insurance Adversary Proceeding**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Rubinstein, J.	1/03/23	Review correspondence from co-counsel and insurer defendants re discovery (0.6); communicate with team re multiple legal issue analyses (0.2); communicate with team re coverage analysis (0.2); review revised deposition outline for Deponent #14 (2.6); revise Rule 30(b)(1) deposition notice (0.3); draft correspondence with potential expert (0.3).	4.10	4,100.00
Gaske, A.	1/03/23	Analyze deposition exhibits for deposition of Deponent #14.	1.20	798.00
Gaske, A.	1/03/23	Correspond with co-counsel and opposing counsel re deposition of Deponent #5.	.40	266.00
Gaske, A.	1/03/23	Revise draft deposition notice for Deponent #5.	.40	266.00
Gaske, A.	1/03/23	Revise deposition outline for Deponent #14 pursuant to additional comments.	1.80	1,197.00
Leveridge, R.	1/03/23	Communicate with co-counsel re discovery issues.	.40	640.00
Leveridge, R.	1/03/23	Communicate with counsel for Deponent #13.	.30	480.00
Leveridge, R.	1/03/23	Communicate with team re potential expert.	.30	480.00

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Name	Date	Services	Hours	Amount
Sraders, S.	1/03/23	Communicate with J. Rubinstein re upcoming meetings.	.10	72.50
Turner, C.	1/03/23	Review and organize Deponent #3 deposition notice.	.30	67.50
Turner, C.	1/03/23	Review and organize Deponent #5 deposition notice.	.50	112.50
Poz, N.	1/03/23	Update communication tracking re Insurer #25.	.10	35.00
Poz, N.	1/03/23	Finalize first supplemental notice of deposition of Deponent #5.	.80	280.00
Rubinstein, J.	1/04/23	Confer with S. Sraders re deposition preparation and expert work (0.8); confer with R. Leveridge re open issues (0.3); correspond with Consulting Expert A re analysis (0.3); preparation for Deponent #13 deposition (0.2); correspond with co-counsel and insurer defendants re deposition scheduling (0.5); communicate with M. Rush re specific policy terms (0.4); update litigation task list (0.5); review discovery correspondence from insurer counsel re Rule 30(b)(6) testimony (0.9).	3.90	3,900.00
Rush, M.	1/04/23	Analyze response to insurer Rule 30(b)(6) objections and meet-and-confers.	4.80	3,960.00
Rush, M.	1/04/23	Communicate with co-counsel re Deponent #16.	.20	165.00
Gaske, A.	1/04/23	Correspond with co-plaintiffs re scheduling Deponent #4 deposition.	.40	266.00
Gaske, A.	1/04/23	Review deposition outline for Deponent #14 and share outline with co-plaintiffs.	.60	399.00
Leveridge, R.	1/04/23	Communicate with counsel for Deponent #13 (0.3); confer with J. Rubinstein re open issues (0.3).	.60	960.00
Leveridge, R.	1/04/23	Communicate with co-counsel and opposing counsel re deposition planning and scheduling.	.40	640.00
Sraders, S.	1/04/23	Confer with J. Rubinstein re deposition and expert strategy.	.80	580.00
Sraders, S.	1/04/23	Analyze documents for upcoming deposition of Deponent #18.	.50	362.50
Turner, C.	1/04/23	Review and organize Deponent #14 deposition materials.	.60	135.00
Poz, N.	1/04/23	Update case calendar re Deponent #19 deposition.	.10	35.00
Shore, R.	1/05/23	Communicate with R. Leveridge and J. Rubinstein re co-counsel strategy issues.	.20	320.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/05/23	Correspond with co-counsel re deposition scheduling (0.3); revise notices re same (0.2); review materials relevant to preparation for deposition defense of Deponent #19 (4.6); communicate with A. Gaske re Deponent #14 deposition preparation (0.2); communicate with co-counsel re draft responses to Navigators' supplemental interrogatory requests to Rhodes (0.2); confer with team re strategy and open projects (0.4); correspond with potential expert (0.2).	6.10	6,100.00
Sanchez, J.	1/05/23	Confer with team re status of tasks and next steps.	.40	210.00
Sanchez, J.	1/05/23	Review deposition transcript of Deponent #3 for relevant information.	3.60	1,890.00
Rush, M.	1/05/23	Review notice and background materials in preparation for deposition of Deponent #16.	1.30	1,072.50
Rush, M.	1/05/23	Review background materials re Deponent #19.	.70	577.50
Rush, M.	1/05/23	Analyze response to insurer Rule 30(b)(6) objections and meet-and-confers.	4.40	3,630.00
Rush, M.	1/05/23	Confer with team re case status and strategy.	.40	330.00
Rush, M.	1/05/23	Draft letter to insurers re Rule 30(b)(6) depositions.	.60	495.00
Martinez, S.	1/05/23	Confer with team re case status and strategy.	.40	140.00
Bonesteel, A.	1/05/23	Confer with team re case status and next steps.	.40	160.00
Gaske, A.	1/05/23	Confer with team re case status and strategy.	.40	266.00
Gaske, A.	1/05/23	Correspond with counsel for Aspen and NA Elite re policy stipulations.	.20	133.00
Gaske, A.	1/05/23	Correspond with insurer counsel, co-counsel, and J. Rubinstein re deposition scheduling.	.90	598.50
Leveridge, R.	1/05/23	Communicate with co-counsel re strategy issues (0.2); communicate with R. Shore and J. Rubinstein re same (0.2).	.40	640.00
Farra, A.	1/05/23	Confer with team re litigation update.	.40	310.00
Sraders, S.	1/05/23	Confer with team re case update and strategy.	.40	290.00
Turner, C.	1/05/23	Confer with team re litigation strategy and update.	.40	90.00
Turner, C.	1/05/23	Review and organize Deponent #14 deposition exhibits.	.50	112.50
Hubbard, B.	1/05/23	Confer with team re status and strategy.	.40	200.00
Hubbard, B.	1/05/23	Review materials sent by Consulting Expert A.	.70	350.00
Huddleston, D.	1/05/23	Confer with team re litigation status.	.40	210.00
Agwu, I.	1/05/23	Confer with team re case status and strategy.	.40	210.00
Poz, N.	1/05/23	Draft first supplemental notice of deposition of Deponent #16.	.30	105.00

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Name	Date	Services	Hours	Amount
Poz, N.	1/05/23	Review and organize discovery materials re Insurer #25 in preparation for depositions.	.50	175.00
Poz, N.	1/05/23	Confer with team re case status and next steps.	.40	140.00
Dougherty, J.	1/05/23	Confer with team re case update and strategy.	.40	330.00
Rubinstein, J.	1/06/23	Review production correspondence (0.1); revise deposition notices (0.3); revise Rule 30(b)(6) deficiency letter related materials (1.5); confer with A. Gaske re preparation for Deponent #14 deposition (1.0); review deposition tracking chart and correspond with co-counsel re same (0.2); review upcoming deposition schedule (0.3); correspond with co-counsel re responses to Navigators' supplemental interrogatories (0.2); correspond with co-counsel re deposition scheduling (0.3).	3.90	3,900.00
Sanchez, J.	1/06/23	Continue reviewing deposition transcript of Deponent #3 for relevant information.	3.80	1,995.00
Rush, M.	1/06/23	Analyze response to insurer Rule 30(b)(6) objections and meet-and-confers.	.30	247.50
Rush, M.	1/06/23	Continue drafting letter to insurers re Rule 30(b)(6) depositions.	3.70	3,052.50
Rush, M.	1/06/23	Outline response to letter from Navigators' counsel.	.80	660.00
Gaske, A.	1/06/23	Correspond with opposing counsel and co-plaintiffs re deposition notice for Deponent #5.	.40	266.00
Gaske, A.	1/06/23	Revise draft deposition notice for Deponent #5.	.20	133.00
Gaske, A.	1/06/23	Revise draft objections to Navigators' supplemental set of interrogatories.	.30	199.50
Gaske, A.	1/06/23	Review deposition outline for Deponent #14.	.90	598.50
Gaske, A.	1/06/23	Confer with J. Rubinstein re preparation for Deponent #14 deposition.	1.00	665.00
Leveridge, R.	1/06/23	Analysis re discovery status, deposition planning, and scheduling.	1.10	1,760.00
Sraders, S.	1/06/23	Research re potential experts.	.30	217.50
Sraders, S.	1/06/23	Communicate with J. Rubinstein re deposition of Deponent #18.	.20	145.00
Turner, C.	1/06/23	Review and organize Navigators' meet-and-confer letter.	.20	45.00
Hubbard, B.	1/06/23	Communicate with Consulting Expert A re next steps.	.20	100.00
Poz, N.	1/06/23	Draft first supplemental notice of deposition of Deponent #4.	.30	105.00
Leveridge, R.	1/07/23	Communicate with co-counsel (UCC) re strategy call.	.20	320.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/08/23	Revise Rhodes objections and responses to Navigators' supplemental interrogatories (0.9); communicate with R. Leveridge re litigation strategy across multiple projects (0.5).	1.40	1,400.00
Gaske, A.	1/08/23	Revise draft responses to Navigators' supplemental set of interrogatories.	1.10	731.50
Leveridge, R.	1/08/23	Review and comment on draft interrogatory responses.	.70	1,120.00
Sraders, S.	1/08/23	Analysis of relevant policies re Issue #52.	.70	507.50
Gilbert, S.	1/09/23	Confer with R. Shore, R. Leveridge and J. Rubinstein re insurance strategy.	.70	1,365.00
Shore, R.	1/09/23	Confer with R. Leveridge and J. Rubinstein re litigation status and next steps.	.90	1,440.00
Shore, R.	1/09/23	Confer with J. Rubinstein, S. Sraders, and A. Gaske re Issue #52 (1.6); analysis re same (0.4).	2.00	3,200.00
Shore, R.	1/09/23	Confer with S. Gilbert, R. Leveridge, and J. Rubinstein re insurance strategy.	.70	1,120.00
Rubinstein, J.	1/09/23	Revise discovery correspondence (1.5); confer with R. Shore, A. Gaske, and S. Sraders re Issue #52 (1.6); communicate with B. Hubbard re expert analysis (0.4); confer with R. Leveridge and R. Shore re strategy analysis (0.9); confer with S. Gilbert, R. Shore, and R. Leveridge re strategy (0.7);	5.10	5,100.00
Sanchez, J.	1/09/23	Draft summary of deposition transcript of Deponent #3.	2.20	1,155.00
Rush, M.	1/09/23	Draft letter to Navigators re discovery issues.	3.70	3,052.50
Rush, M.	1/09/23	Draft outline in preparation for deposition on Deponent #16.	2.20	1,815.00
Gaske, A.	1/09/23	Confer with S. Sraders re Issue #52.	.40	266.00
Gaske, A.	1/09/23	Confer with R. Shore, J. Rubinstein, and S. Sraders re Issue #52.	1.60	1,064.00
Gaske, A.	1/09/23	Revise response to Navigators' discovery request.	1.20	798.00
Leveridge, R.	1/09/23	Confer with R. Shore and J. Rubinstein re discovery strategy.	.90	1,440.00
Leveridge, R.	1/09/23	Confer with A. Crawford (Akin) re strategy issues.	.40	640.00
Leveridge, R.	1/09/23	Confer with S. Gilbert, R. Shore, and J. Rubinstein re insurance strategy and related issues.	.70	1,120.00
Leveridge, R.	1/09/23	Communicate with Reed Smith re discovery and strategy issues (0.6); communicate with J. Rubinstein re same (0.3).	.90	1,440.00
Sraders, S.	1/09/23	Confer with R. Shore, J. Rubinstein, and A. Gaske re Issue #52.	1.60	1,160.00

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Sraders, S.	1/09/23	Confer with A. Gaske re analysis of Issue #52.	.40	290.00
Sraders, S.	1/09/23	Analysis of Issue #52.	.70	507.50
Turner, C.	1/09/23	Review and organize Deponent #4 notice of deposition.	.40	90.00
Turner, C.	1/09/23	Review and organize exhibits for Deponent #14 deposition.	1.90	427.50
Hubbard, B.	1/09/23	Communicate with Consulting Expert A re next steps.	.70	350.00
Poz, N.	1/09/23	Update litigation calendar per scheduling order entered on December 22, 2022.	.30	105.00
Poz, N.	1/09/23	Finalize first supplemental notice of deposition of Deponent #4.	.40	140.00
Poz, N.	1/09/23	Finalize first supplemental notice of deposition of Deponent #16.	.30	105.00
Poz, N.	1/09/23	Review and organize co-plaintiffs' 45th production.	.40	140.00
Shore, R.	1/10/23	Attend E. Mahoney deposition (partial).	1.70	2,720.00
Shore, R.	1/10/23	Communicate with R. Leveridge and J. Rubinstein re deposition.	.30	480.00
Rubinstein, J.	1/10/23	Attend E. Mahoney deposition.	9.60	9,600.00
Rush, M.	1/10/23	Draft letter to Navigators re discovery issues	3.90	3,217.50
Leveridge, R.	1/10/23	Communicate with R. Shore and J. Rubinstein re deposition.	.30	480.00
Ogrey, S.	1/10/23	Research potential expert materials.	2.10	556.50
Sraders, S.	1/10/23	Draft memorandum re Issue #52.	1.30	942.50
Sraders, S.	1/10/23	Research re potential experts.	2.10	1,522.50
Turner, C.	1/10/23	Revise exhibits for Deponent #14 deposition.	1.50	337.50
Hubbard, B.	1/10/23	Confer with Consulting Expert A re initial stages of data review.	.70	350.00
Poz, N.	1/10/23	Research materials related to potential experts.	1.40	490.00
Rubinstein, J.	1/11/23	Analysis re Rhodes discovery issues (0.7); review materials re Deponent #14 deposition (0.5); revise discovery correspondence (1.1); review proposed edits to Liberty policy stipulation (0.5); revise draft Rhodes interrogatory responses to Navigators (0.4).	3.20	3,200.00
Rush, M.	1/11/23	Continue drafting letter to Navigators re discovery issues.	.50	412.50
Rush, M.	1/11/23	Draft outline in preparation for deposition of Deponent #16.	2.80	2,310.00
Gaske, A.	1/11/23	Review deposition outline for deposition of Deponent #14.	4.70	3,125.50

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Gaske, A.	1/11/23	Analyze response to Navigators' supplemental interrogatories.	1.00	665.00
Sraders, S.	1/11/23	Draft memorandum re Issue #52.	1.90	1,377.50
Poz, N.	1/11/23	Review case calendar.	.20	70.00
Poz, N.	1/11/23	Review rough transcript of Deponent #7.	.20	70.00
Poz, N.	1/11/23	Review and organize exhibits from Deponent #7 deposition.	1.30	455.00
Shore, R.	1/12/23	Communicate with R. Leveridge, J. Rubinstein and B. Hubbard re meeting with Consulting Expert A.	.30	480.00
Rubinstein, J.	1/12/23	Attend S. Stevens deposition.	4.00	4,000.00
Rush, M.	1/12/23	Continue drafting deposition outline for Deponent #16.	1.40	1,155.00
Gaske, A.	1/12/23	Review deposition outline for S. Stevens deposition.	.50	332.50
Gaske, A.	1/12/23	Attend deposition of S. Stevens.	4.00	2,660.00
Leveridge, R.	1/12/23	Communicate with J. Rubinstein re report on deposition.	.30	480.00
Leveridge, R.	1/12/23	Communicate with S. Sraders re Deponent #18 deposition.	.20	320.00
Leveridge, R.	1/12/23	Communicate with R. Shore, J. Rubinstein and B. Hubbard re meeting with Consulting Expert A.	.30	480.00
Sraders, S.	1/12/23	Draft memorandum re Issue #52.	2.10	1,522.50
Sraders, S.	1/12/23	Confer with co-counsel re deposition of Deponent #18.	.20	145.00
Turner, C.	1/12/23	Attend deposition to assist with exhibits.	4.00	900.00
Poz, N.	1/12/23	Review co-plaintiffs' claw-back letter.	.20	70.00
Poz, N.	1/12/23	Review Insurer #9 and Insurer #23 supplemental production of documents.	.60	210.00
Rubinstein, J.	1/13/23	Review materials in preparation for defending deposition.	2.00	2,000.00
Rush, M.	1/13/23	Continue drafting letter to Navigators re discovery issues.	.30	247.50
Rush, M.	1/13/23	Continue drafting deposition outline for Deponent #16.	2.70	2,227.50
Sraders, S.	1/13/23	Revise draft memorandum re Issue #52.	.10	72.50
Sraders, S.	1/13/23	Revise draft notice of deposition for Deponent #18.	.40	290.00
Poz, N.	1/13/23	Review and organize co-plaintiffs' 28th supplemental production.	.30	105.00
Poz, N.	1/13/23	Review rough transcript of Deponent #14.	.20	70.00
Poz, N.	1/13/23	Review deposition and case deadlines.	.20	70.00
Poz, N.	1/13/23	Draft notice of deposition of Deponent #18.	.40	140.00



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Name	Date	Services	Hours	Amount
Poz, N.	1/13/23	Review open sources of exhibits for deposition of Deponent #16.	.20	70.00
Poz, N.	1/13/23	Organize co-plaintiffs' answers to Insurer #25 supplemental set of interrogatories.	.20	70.00
Rubinstein, J.	1/15/23	Review correspondence re settlement (0.3); review revised deposition notice (0.3).	.60	600.00
Rubinstein, J.	1/16/23	Revise discovery deficiency letter re Navigators (0.4); revise current version of offensive Rule 30(b)(6) meet-and-confer letter (1.8).	2.20	2,200.00
Rush, M.	1/16/23	Draft letter to Navigators re discovery issues.	.50	412.50
Sraders, S.	1/16/23	Draft memorandum re Issue #52.	2.20	1,595.00
Sraders, S.	1/16/23	Analyze privilege log for Insurer #24.	1.20	870.00
Shore, R.	1/17/23	Communicate with R. Leveridge and J. Rubinstein re strategy and open tasks.	.60	960.00
Rubinstein, J.	1/17/23	Communicate with co-counsel re Liberty policy stipulation project (0.4); confer with Liberty counsel and A. Gaske re same (0.3); communicate with R. Shore and R. Leveridge re strategy and open tasks (0.6); communicate with M. Rush re Rule 30(b)(6) discovery letter (0.2); communicate with R. Leveridge re contention interrogatories (0.2); communicate with team re deposition follow-up tasks (0.5); analysis re coverage portfolio (0.5); review Insurer #18 supplemental production (0.2); review Insurer #24 privilege log assessment (0.1); review analysis re additional potential experts (0.3).	3.30	3,300.00
Rush, M.	1/17/23	Review case update re Issue #14.	.50	412.50
Rush, M.	1/17/23	Revise letter to Navigators re discovery issues.	.50	412.50
Rush, M.	1/17/23	Revise letter to insurers re Rule 30(b)(6) meet-and-confer.	1.80	1,485.00
Gaske, A.	1/17/23	Confer with counsel from Liberty re policy stipulations.	.30	199.50
Gaske, A.	1/17/23	Review Liberty policy comparison spreadsheet in preparation for call with Liberty's counsel.	.70	465.50
Gaske, A.	1/17/23	Review draft agreement with Insurer #12.	1.10	731.50
Gaske, A.	1/17/23	Analyze draft memorandum re Issue #52.	.70	465.50
Leveridge, R.	1/17/23	Review legal ruling on Issue #14 (0.4); communicate with J. Rubinstein re same (0.2).	.60	960.00
Leveridge, R.	1/17/23	Communicate with R. Shore, J. Rubinstein, and A. Farra re discovery issues.	.60	960.00
Ogrey, S.	1/17/23	Revise materials for Deponent #16 deposition.	.30	79.50
Sraders, S.	1/17/23	Communicate with J. Rubinstein and R. Leveridge re potential experts.	.30	217.50

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Name	Date	Services	Hours	Amount
Sraders, S.	1/17/23	Confer with UCC and Reed Smith re notice of deposition for Deponent #18.	.50	362.50
Sraders, S.	1/17/23	Analyze relevant documents for Deponent #18.	.80	580.00
Sraders, S.	1/17/23	Communicate with A. Gaske re Issue #52 memorandum.	.10	72.50
Sraders, S.	1/17/23	Communicate with J. Rubinstein re Issue #34 memorandum.	.10	72.50
Sraders, S.	1/17/23	Analyze privilege log for Insurer #24.	.40	290.00
Kaminsky, E.	1/17/23	Analyze agreement with Insurer #12.	1.00	665.00
Turner, C.	1/17/23	Review and organize Deponent #18 deposition notice.	.40	90.00
Turner, C.	1/17/23	Review and organize Deponent #14 deposition notice.	.60	135.00
Poz, N.	1/17/23	Continue reviewing discovery materials and public records for documents re Insurer #25 in preparation for depositions.	.30	105.00
Poz, N.	1/17/23	Finalize notice of deposition of Deponent #18.	.30	105.00
Rubinstein, J.	1/18/23	Analysis re potential experts (1.1); communicate with team re legal research re Rule 30(b)(6) discovery letter (0.2); communicate with C. Turner re bankruptcy hearing agenda (0.1); update litigation task list (0.6); communicate with S. Sraders re Deponent #18 deposition outline (0.1); communicate with M. Rush re Deponent #16 deposition preparation (0.3).	2.40	2,400.00
Rush, M.	1/18/23	Draft outline for deposition of Deponent #16.	4.10	3,382.50
Gaske, A.	1/18/23	Confer with UCC re insurance analysis.	.80	532.00
Gaske, A.	1/18/23	Confer with S. Sraders re Issue #52.	.60	399.00
Gaske, A.	1/18/23	Revise letter to insurers re Rule 30(b)(6) deposition notice.	1.30	864.50
Gaske, A.	1/18/23	Revise memorandum on Issue #52.	2.20	1,463.00
Gaske, A.	1/18/23	Revise letter to insurers re Rule 30(b)(6) depositions.	.80	532.00
Leveridge, R.	1/18/23	Review discovery issues.	.40	640.00
Leveridge, R.	1/18/23	Communicate with J. Rubinstein and S. Sraders re experts.	.60	960.00
Sraders, S.	1/18/23	Communicate with A. Gaske and J. Dougherty re draft Rule 30(b)(6) letter.	.20	145.00
Sraders, S.	1/18/23	Confer with A. Gaske re Issue #52.	.60	435.00
Sraders, S.	1/18/23	Research in support of letter re Rule 30(b)(6) depositions.	2.20	1,595.00
Sraders, S.	1/18/23	Analyze revised memorandum re Issue #52.	.60	435.00

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Name	Date	Services	Hours	Amount
Sraders, S.	1/18/23	Correspond with potential experts, R. Leveridge and J. Rubinstein re potential introductory meeting.	.60	435.00
Sraders, S.	1/18/23	Review deposition outline for Deponent #18.	.10	72.50
Kaminsky, E.	1/18/23	Confer with counsel for Insurer #12 re agreement.	.20	133.00
Kaminsky, E.	1/18/23	Analyze agreement with Insurer #12.	1.00	665.00
Agwu, I.	1/18/23	Begin summarizing Deponent #7 deposition transcript.	3.40	1,785.00
Poz, N.	1/18/23	Organize final transcript and exhibits for Deponent #7.	.40	140.00
Poz, N.	1/18/23	Communicate with co-counsel re deposition of Deponent #16 and sharing additional documents.	.10	35.00
Poz, N.	1/18/23	Organize insurers' supplemental production of documents and privilege log.	.80	280.00
Dougherty, J.	1/18/23	Review transcript of Deponent #3 for potential follow-up items (1.2); review transcripts of Deponent #1, #2 and #3 re issues raised in Rule 30(b)(6) meet-and-confer and letter memorializing same (3.6).	4.80	3,960.00
Shore, R.	1/19/23	Confer with Consulting Expert A and team re initial analysis.	1.10	1,760.00
Shore, R.	1/19/23	Confer with team re litigation status and next steps.	.60	960.00
Rubinstein, J.	1/19/23	Communicate with A. Gaske re insurer production and privilege log review analysis (0.2); confer with Consulting Expert A, R. Leveridge, R. Shore and B. Hubbard re analysis (1.1); confer with team re tasks and strategy (0.6); review materials in preparation for call with potential expert (0.4).	2.30	2,300.00
Sanchez, J.	1/19/23	Confer with team re status and upcoming deadlines.	.60	315.00
Rush, M.	1/19/23	Communications with L. Szymanski and J. Rubinstein re insurer privilege claims.	.30	247.50
Martinez, S.	1/19/23	Confer with team re case status and strategy.	.50	175.00
Bonesteel, A.	1/19/23	Confer with team re case status and strategy.	.60	240.00
Gaske, A.	1/19/23	Review insurer supplemental productions.	.80	532.00
Gaske, A.	1/19/23	Confer with team re litigation strategy and next steps.	.60	399.00
Gaske, A.	1/19/23	Research re Issue #52.	1.60	1,064.00
Leveridge, R.	1/19/23	Confer with Consulting Expert A, R. Shore, J. Rubinstein and B. Hubbard re initial analyses (1.1); communicate with J. Rubinstein re same (0.3).	1.40	2,240.00
Leveridge, R.	1/19/23	Confer with team re litigation status and next steps.	.60	960.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	1/19/23	Review communications with co-counsel and opposing counsel re discovery issues.	.40	640.00
Farra, A.	1/19/23	Confer with team re litigation update.	.60	465.00
Sraders, S.	1/19/23	Analyze relevant policies re Issue #52.	.60	435.00
Sraders, S.	1/19/23	Review documents for Potential Expert E.	1.10	797.50
Kaminsky, E.	1/19/23	Confer with team re case status and strategy.	.60	399.00
Hubbard, B.	1/19/23	Meet with Consulting Expert A re initial analysis.	1.10	550.00
Hubbard, B.	1/19/23	Meet with team re status and strategy.	.60	300.00
Hubbard, B.	1/19/23	Investigation re claim data.	.20	100.00
Huddleston, D.	1/19/23	Confer with team re case status and strategy.	.60	315.00
Agwu, I.	1/19/23	Confer with team re litigation strategy and status.	.60	315.00
Agwu, I.	1/19/23	Continue summarizing Deponent #7 deposition transcript.	4.10	2,152.50
Poz, N.	1/19/23	Confer with team re case status and next steps.	.60	210.00
Poz, N.	1/19/23	Organize transcripts of depositions of Deponents #3 and #7 and exhibits.	.30	105.00
Dougherty, J.	1/19/23	Confer with team re litigation status and strategy.	.60	495.00
Rubinstein, J.	1/20/23	Review materials in preparation for call with Potential Expert E (0.6); confer with Potential Expert E, R. Leveridge, and S. Sraders (0.7); analysis re additional potential experts (0.4); communicate with co-counsel re deposition preparation re Deponent #16 (0.3); begin analysis of memorandum re issue #52 (0.7); review documents to provide additional guidance to Consulting Expert A analysis (1.7); review discovery correspondence from Navigators (0.3).	4.70	4,700.00
Rush, M.	1/20/23	Communicate with team re deposition of Deponent #16.	.20	165.00
Gaske, A.	1/20/23	Revise memorandum re Issue #52.	1.80	1,197.00
Leveridge, R.	1/20/23	Review potential expert CV in preparation for call (0.4); confer with Potential Expert E (0.7).	1.10	1,760.00
Leveridge, R.	1/20/23	Review communications from co-counsel and opposing counsel re discovery issues (0.4); analysis re same (0.3).	.70	1,120.00
Farra, A.	1/20/23	Draft contention interrogatory responses.	.10	77.50
Sraders, S.	1/20/23	Draft deposition outline for Deponent #18.	1.10	797.50
Sraders, S.	1/20/23	Correspond with A. Gaske re Issue #52.	.50	362.50
Sraders, S.	1/20/23	Confer with Potential Expert E, R. Leveridge and J. Rubinstein.	.70	507.50
Sraders, S.	1/20/23	Review materials in preparation for call with Potential Expert E.	.30	217.50

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Agwu, I.	1/20/23	Continue summarizing Deponent #7 deposition transcript.	3.70	1,942.50
Rush, M.	1/21/23	Draft outline for Deponent #16 deposition.	3.10	2,557.50
Dougherty, J.	1/21/23	Revise draft letter to insurers re meet-and-confer of Rule 30(b)(6) deposition notices.	2.60	2,145.00
Rubinstein, J.	1/22/23	Continue review of underlying documents to direct Consulting Expert A re analysis (1.6); continue revising omnibus Rule 30(b)(6) offensive discovery letter to insurers (1.4).	3.00	3,000.00
Rush, M.	1/22/23	Continue draft outline for deposition of Deponent #16.	7.40	6,105.00
Leveridge, R.	1/22/23	Review sample underlying personal injury complaint.	.70	1,120.00
Farra, A.	1/22/23	Draft contention interrogatory responses.	2.90	2,247.50
Sraders, S.	1/22/23	Draft deposition outline for Deponent #18.	5.20	3,770.00
Shore, R.	1/23/23	Confer with R. Leveridge and J. Rubinstein re strategy and next steps.	.90	1,440.00
Shore, R.	1/23/23	Communicate with A. Gaske re fronting policies and collateral issues.	.20	320.00
Rubinstein, J.	1/23/23	Review agenda for omnibus hearing (0.2); correspond with AHC co-counsel re same (0.2); provide information to Consulting Expert A to guide analysis (0.5); confer with R. Shore and R. Leveridge re strategy/next steps (0.9); communicate with Debtors' counsel re Deponent #16 deposition (0.6); analysis re Potential Expert G (0.2); communicate with Debtors' counsel re updated deposition schedule (0.3); confer with R. Leveridge and A. Farra re contention interrogatory responses (1.3); correspond with A. Gaske re draft Insurer #33 discovery letter (0.2); review proposed edits to offensive Rule 30(b)(6) discovery letter (0.4); correspond with team re Liberty policy stipulation (0.2); correspond with M. Rush re Navigators/Rhodes meet-and-confer correspondence/discussion (0.2); review discovery correspondence from National Union (0.1).	5.30	5,300.00
Rush, M.	1/23/23	Communicate with L. Szymanski and J. Rubinstein re Navigators' discovery issues.	.70	577.50
Gaske, A.	1/23/23	Analyze transcript of Deponent #14.	1.70	1,130.50
Gaske, A.	1/23/23	Revise letter to insurers re Rule 30(b)(6) topics.	.70	465.50
Gaske, A.	1/23/23	Analyze settlement agreement with Insurer #12.	2.30	1,529.50
Gaske, A.	1/23/23	Analyze Liberty's revised policy comparison spreadsheet.	1.60	1,064.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	1/23/23	Confer with R. Shore and J. Rubinstein re status of litigation preparations including expert analyses, discovery and legal research.	.90	1,440.00
Leveridge, R.	1/23/23	Confer with J. Rubinstein and A. Farra re responses to interrogatories.	1.30	2,080.00
Leveridge, R.	1/23/23	Communicate with potential expert re case.	.40	640.00
Leveridge, R.	1/23/23	Communicate with J. Rubinstein, M. Rush, S. Sraders, and A. Gaske re discovery issues.	.50	800.00
Leveridge, R.	1/23/23	Review communication from Debtors' counsel to opposing counsel re discovery issue.	.20	320.00
Leveridge, R.	1/23/23	Communicate with J. Rubinstein re underlying complaint information highlighted by expert.	.20	320.00
Leveridge, R.	1/23/23	Review underlying complaint information highlighted by expert.	.70	1,120.00
Ogrey, S.	1/23/23	Review Liberty newly produced policy for differences against plaintiffs' produced copy.	2.00	530.00
Farra, A.	1/23/23	Continue drafting contention interrogatory responses.	2.20	1,705.00
Farra, A.	1/23/23	Confer with R. Leveridge and J. Rubinstein re contention interrogatories.	1.30	1,007.50
Sraders, S.	1/23/23	Correspond with potential expert re case.	.10	72.50
Sraders, S.	1/23/23	Revise draft Rule 30(b)(6) letter.	.60	435.00
Sraders, S.	1/23/23	Draft outline for deposition of Deponent #18.	1.50	1,087.50
Hubbard, B.	1/23/23	Review documentation re underlying complaint information and allegations.	.80	400.00
Hubbard, B.	1/23/23	Prepare documentation to assist in review of complaints and claims materials.	.40	200.00
Agwu, I.	1/23/23	Summarize Deponent #7 deposition transcript.	4.30	2,257.50
Poz, N.	1/23/23	Review recent communications between plaintiffs and Insurer #25.	.30	105.00
Rubinstein, J.	1/24/23	Confer with Debtors' counsel and M. Rush re Navigators' discovery issues (0.9); review insurer discovery correspondence (0.5); revise offensive discovery correspondence (0.6); revise draft deposition outline re Deponent #18 (3.1); review associated potential exhibits (1.1); participate in meet-and-confer with Navigators (0.7); confer with L. Szymanski re same (0.4); revise draft discovery letter to Insurer #33 based on deposition testimony (0.3); correspond with A. Gaske re Liberty policy stipulation (0.2); correspond with Potential Expert G (0.1).	7.90	7,900.00

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Name	Date	Services	Hours	Amount
Rush, M.	1/24/23	Confer with L. Szymanski and J. Rubinstein re Navigators' discovery issues.	.90	742.50
Rush, M.	1/24/23	Confer with Navigators' counsel re discovery deficiencies.	.70	577.50
Gaske, A.	1/24/23	Draft letter to Insurer #33 re discovery.	2.20	1,463.00
Gaske, A.	1/24/23	Analyze policies issued by Insurer #12.	1.20	798.00
Gaske, A.	1/24/23	Analyze Liberty policies re policy stipulation.	1.70	1,130.50
Leveridge, R.	1/24/23	Confer with Navigators' counsel and co-counsel re discovery issues relating to Rhodes.	.70	1,120.00
Ogrey, S.	1/24/23	Review and organize Insurer #24 supplemental production.	.70	185.50
Farra, A.	1/24/23	Draft analysis re deposition letter response issues.	.80	620.00
Sraders, S.	1/24/23	Revise draft Rule 30(b)(6) letter.	1.30	942.50
Sraders, S.	1/24/23	Analyze additional production from Insurer #24.	1.00	725.00
Turner, C.	1/24/23	Review and update deposition tracking calendar.	.70	157.50
Turner, C.	1/24/23	Review and organize Deponent #14 exhibits.	.60	135.00
Hubbard, B.	1/24/23	Review claims information.	1.40	700.00
Huddleston, D.	1/24/23	Summarize Deponent #14 deposition transcript.	1.50	787.50
Agwu, I.	1/24/23	Continue summarizing Deponent #7 deposition transcript.	4.00	2,100.00
Rubinstein, J.	1/25/23	Revise correspondence re deposition scheduling (0.2); provide comments to Deponent #18 deposition outline (0.2); communicate with team re Insurer #33 discovery letter (0.2); review materials in preparation for call with Potential Expert F (0.3); confer with Potential Expert F, R. Leveridge, and S. Sraders (0.6); review communications re discovery correspondence (0.5); correspond with S. Sraders re Insurers #5 and #36 privilege logs (0.1); correspond with Potential Expert E (0.2).	2.30	2,300.00
Rush, M.	1/25/23	Draft correspondence to Navigators re upcoming deposition.	.30	247.50
Gaske, A.	1/25/23	Analyze Liberty proposed policy pages re policy stipulation.	.80	532.00
Gaske, A.	1/25/23	Finalize letter to XLIA re discovery.	1.20	798.00
Gaske, A.	1/25/23	Revise deposition outline for Deponent #4.	.70	465.50
Leveridge, R.	1/25/23	Confer with Potential Expert F, J. Rubinstein and S. Sraders re possible project.	.60	960.00
Leveridge, R.	1/25/23	Review and comment on deposition outline for Deponent #18.	1.40	2,240.00
Sraders, S.	1/25/23	Confer with Potential Expert F, R. Leveridge, and J. Rubinstein.	.60	435.00

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Name	Date	Services	Hours	Amount
Sraders, S.	1/25/23	Review materials in preparation for call with Potential Expert F.	.20	145.00
Sraders, S.	1/25/23	Analyze privilege log produced by Insurer #36.	.70	507.50
Sraders, S.	1/25/23	Correspond with Potential Expert E re requested materials.	.70	507.50
Turner, C.	1/25/23	Update case calendar re hearing dates.	.30	67.50
Turner, C.	1/25/23	Review and organize Deponent #14 exhibits.	.60	135.00
Turner, C.	1/25/23	Review and organize insurance-related documents.	.40	90.00
Hubbard, B.	1/25/23	Review additional proofs of claim submissions.	.60	300.00
Agwu, I.	1/25/23	Continue summarizing Deponent #7 deposition transcript.	3.30	1,732.50
Rubinstein, J.	1/26/23	Review proposed edits to Deponent #18 deposition outline (0.8); confer with R. Leveridge and S. Sraders re same (1.1); communicate with A. Gaske re proposed edits to Liberty policy stipulation and policy form attachments thereto (0.6); update litigation task list (0.4); correspond with co-counsel re discovery correspondence with Navigators (1.3); confer with team re strategy (0.7).	4.90	4,900.00
Sanchez, J.	1/26/23	Confer with team re status of tasks and next steps.	.70	367.50
Bonesteel, A.	1/26/23	Confer with team re litigation status and strategy.	.70	280.00
Bonesteel, A.	1/26/23	Review database materials for correspondence from Deponent #18.	.60	240.00
Gaske, A.	1/26/23	Review draft of Liberty policy stipulation.	1.00	665.00
Gaske, A.	1/26/23	Confer with team re strategy and case next steps.	.70	465.50
Leveridge, R.	1/26/23	Communicate with J. Rubinstein re preparation for upcoming deposition.	.40	640.00
Leveridge, R.	1/26/23	Review and provide comments to draft letter from Reed Smith to Navigators' counsel re Rhodes/Navigators discovery issues and conference.	.60	960.00
Leveridge, R.	1/26/23	Confer with J. Rubinstein and S. Sraders re Deponent #18 deposition.	1.10	1,760.00
Leveridge, R.	1/26/23	Confer with team re case status and strategy.	.70	1,120.00
Farra, A.	1/26/23	Confer with team re case status and next steps.	.70	542.50
Sraders, S.	1/26/23	Confer with team re litigation status and strategy.	.70	507.50
Sraders, S.	1/26/23	Confer with R. Leveridge and J. Rubinstein re outline for Deponent #18.	1.10	797.50
Sraders, S.	1/26/23	Analyze revised outline for Deponent #18 in light of comments from J. Rubinstein and R. Leveridge.	1.20	870.00
Sraders, S.	1/26/23	Analyze privilege log produced by Insurer #36.	.40	290.00
Kaminsky, E.	1/26/23	Confer with team re case update and strategy.	.70	465.50



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Name	Date	Services	Hours	Amount
Turner, C.	1/26/23	Confer with team re litigation strategy and update.	.70	157.50
Hubbard, B.	1/26/23	Confer with team re status and strategy.	.70	350.00
Huddleston, D.	1/26/23	Summarize deposition transcript of Deponent #14.	1.20	630.00
Huddleston, D.	1/26/23	Confer with team re case strategy.	.70	367.50
Agwu, I.	1/26/23	Confer with team re litigation update.	.70	367.50
Agwu, I.	1/26/23	Draft summary of Issue #19.	4.00	2,100.00
Agwu, I.	1/26/23	Summarize Deponent #7 deposition transcript.	2.30	1,207.50
Poz, N.	1/26/23	Research co-plaintiffs' privilege logs.	.20	70.00
Poz, N.	1/26/23	Confer with team re case status and next steps.	.70	245.00
Rubinstein, J.	1/27/23	Correspond with insurers and A. Gaske re policy stipulations (0.3); review correspondence with insurers re discovery issues (0.3); correspond with Consulting Expert A re analysis (0.2); preparation for call with Potential Expert G (0.3); confer with Potential Expert G and R. Leveridge re potential scope of work (0.8); revise Deponent #16 deposition outline (3.0); correspond with Debtors' counsel re preparation for Deponent #19 deposition (0.2); review notice re Leopold claim (0.2).	5.30	5,300.00
Rush, M.	1/27/23	Revise outline for Deponent #16.	.60	495.00
Gaske, A.	1/27/23	Analyze Liberty edits to draft policy stipulation and policy page proposals.	1.10	731.50
Gaske, A.	1/27/23	Correspond with counsel for SRCS Elite and Aspen re status of policy stipulation.	.10	66.50
Gaske, A.	1/27/23	Draft portion of deposition outline for Deponent #5.	.20	133.00
Leveridge, R.	1/27/23	Confer with Potential Expert G and J. Rubinstein (0.8); review CV of potential expert (0.1).	.90	1,440.00
Sraders, S.	1/27/23	Revise draft outline for upcoming deposition of Deponent #18.	1.80	1,305.00
Sraders, S.	1/27/23	Revise draft Rule 30(b)(6) letter.	1.70	1,232.50
Sraders, S.	1/27/23	Correspond with team re privilege logs produced by Insurer #36.	.40	290.00
Turner, C.	1/27/23	Review and organize meet-and-confer letter.	.30	67.50
Turner, C.	1/27/23	Review deposition calendar.	.10	22.50
Hubbard, B.	1/27/23	Continue reviewing claims data.	1.20	600.00
Agwu, I.	1/27/23	Finish drafting summary of research re Issue #19.	1.20	630.00
Agwu, I.	1/27/23	Continue summarizing Deponent #7 deposition transcript.	1.50	787.50
Agwu, I.	1/27/23	Research re Issue #14.	2.90	1,522.50
Poz, N.	1/27/23	Revise letter to insurers re Rule 30(b)(6) depositions.	.50	175.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	1/29/23	Correspond with Consulting Expert A re analysis (0.1); review bankruptcy filings (0.2); revise offensive Rule 30(b)(6) letter (0.8); correspond with co-counsel re same (0.2).	1.30	1,300.00
Sraders, S.	1/29/23	Revise draft deposition outline for Deponent #18.	3.20	2,320.00
Sraders, S.	1/29/23	Draft retention agreement for Potential Expert G.	.50	362.50
Shore, R.	1/30/23	Confer with R. Leveridge and J. Rubinstein re status, strategy, next steps, including review of claims and potential expert.	1.60	2,560.00
Rubinstein, J.	1/30/23	Confer with R. Shore and R. Leveridge re litigation strategy (1.6); communicate with team re insurer productions, discovery correspondence, and privilege logs (0.5); communicate with team re Liberty policy stipulation (0.2); begin reviewing prior testimony in preparation for Deponent #19 deposition (2.3); communicate with Consulting Expert A re analysis (0.3); confer with A. Gaske re edits proposed by Liberty re policy stipulation (0.3); communicate with Debtors' counsel re insurer document productions (0.2); review draft Potential Expert G engagement letter and provide comments (0.3); review TIG correspondence (0.2).	5.90	5,900.00
Rush, M.	1/30/23	Revise outline for Deponent #16.	.80	660.00
Rush, M.	1/30/23	Analysis re Issue #14.	.30	247.50
Gaske, A.	1/30/23	Confer with J. Rubinstein re open issues on Liberty policy stipulation.	.30	199.50
Gaske, A.	1/30/23	Review exhibits to Liberty policy stipulation.	.60	399.00
Leveridge, R.	1/30/23	Confer with R. Shore and J. Rubinstein re status of expert discussions, discovery status and related matters.	1.60	2,560.00
Leveridge, R.	1/30/23	Review recent complaint re opioids coverage (0.8); communicate with team re same (0.3).	1.10	1,760.00
Leveridge, R.	1/30/23	Revise draft retainer for Potential Expert B (0.3); communicate with J. Rubinstein and S. Sraders re same (0.1).	.40	640.00
Leveridge, R.	1/30/23	Review communications from Debtors' counsel re strategy issues.	.40	640.00
Leveridge, R.	1/30/23	Review communication from Debtors' counsel re Insurer #2.	.40	640.00
Sraders, S.	1/30/23	Revise draft deposition outline for Deponent #18.	3.40	2,465.00
Sraders, S.	1/30/23	Confer with S. Martinez re deposition of Deponent #18.	.30	217.50
Sraders, S.	1/30/23	Revise draft retention letter for Potential Expert G.	.40	290.00
Sraders, S.	1/30/23	Analyze privilege log for Insurer #36.	.10	72.50

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Name	Date	Services	Hours	Amount
Turner, C.	1/30/23	Review and organize Deponent #19 historic transcripts.	.70	157.50
Agwu, I.	1/30/23	Summarize Deponent #7 deposition transcript.	3.70	1,942.50
Shore, R.	1/31/23	Confer with J. Rubinstein and A. Gaske re Liberty policy stipulation issues.	.30	480.00
Rubinstein, J.	1/31/23	Confer with S. Sraders re deposition preparation and privilege log review (0.3); confer with R. Shore and A. Gaske re Liberty policy stipulation (0.3); confer with R. Leveridge re Potential Expert G retention (0.5); review materials in preparation for deposition of Deponent #19 (1.0); confer with Consulting Expert A and R. Leveridge re analysis (0.4); confer with R. Leveridge and J. Dougherty re offensive case strategy project (0.6); review revised deposition outline of Deponent #18 (1.8); confer with Debtors' counsel and R. Leveridge re strategy (1.1).	6.00	6,000.00
Rush, M.	1/31/23	Review research re Issue #14.	1.20	990.00
Rush, M.	1/31/23	Revise outline for Deponent #16.	5.40	4,455.00
Martinez, S.	1/31/23	Confer with S. Sraders re deposition of Deponent #18.	.30	105.00
Gaske, A.	1/31/23	Confer with R. Shore and J. Rubinstein re Liberty policy stipulation.	.30	199.50
Gaske, A.	1/31/23	Correspond with counsel for SRCS Elite and Aspen re policy stipulations (0.3); correspond with counsel for Liberty re same (0.2).	.50	332.50
Gaske, A.	1/31/23	Revise draft Liberty policy stipulation and policy page spreadsheet.	1.10	731.50
Gaske, A.	1/31/23	Continue research re Issue #52.	2.70	1,795.50
Gaske, A.	1/31/23	Correspond with R. Shore re review of draft settlement for Insurer #12.	.20	133.00
Leveridge, R.	1/31/23	Revise retainer letter for Potential Expert B (0.5); communicate with Debtors' counsel re same (0.2).	.70	1,120.00
Leveridge, R.	1/31/23	Review materials in preparation for meeting with Consulting Expert A (0.5); confer with Consulting Expert A re analyses (0.4).	.90	1,440.00
Leveridge, R.	1/31/23	Confer with Debtors' counsel and J. Rubinstein re litigation strategy and related matters.	1.10	1,760.00
Leveridge, R.	1/31/23	Begin review of revised Deponent #18 deposition outline.	.90	1,440.00
Leveridge, R.	1/31/23	Confer with J. Rubinstein and J. Dougherty re litigation-related projects.	.60	960.00
Sraders, S.	1/31/23	Confer with J. Rubinstein re upcoming deposition in case.	.30	217.50

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<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Sraders, S.	1/31/23	Confer with S. Martinez re upcoming deposition of Deponent #18.	.30	217.50
Sraders, S.	1/31/23	Revise draft retention agreement for Potential Expert G.	.50	362.50
Sraders, S.	1/31/23	Correspond with co-counsel re privilege log for Insurer #36.	1.00	725.00
Sraders, S.	1/31/23	Review J. Rubinstein comments to outline for Deponent #18.	.10	72.50
Huddleston, D.	1/31/23	Summarize Deponent #14 deposition transcript.	4.80	2,520.00
Agwu, I.	1/31/23	Continue summarizing Deponent #7 deposition transcript.	4.20	2,205.00
Poz, N.	1/31/23	Organize case materials re Issue #45 research.	.70	245.00
Dougherty, J.	1/31/23	Review draft legal issues tracking memorandum (0.4); confer with J. Rubinstein and R. Leveridge re same and deposition testimony collection projects (0.6); review rulings in recent insurance coverage case (2.8).	3.80	3,135.00
<b>Project Total:</b>			<b>466.10</b>	<b>\$ 378,671.00</b>
<b>TOTAL CHARGEABLE HOURS</b>			<b>503.40</b>	
<b>TOTAL FEES</b>				<b>\$ 408,732.00</b>

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#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	4.80	1,950.00	9,360.00
Quinn, K.	2.30	1,450.00	3,335.00
Shore, R.	13.40	1,600.00	21,440.00
Rubinstein, J.	20.90	500.00	10,450.00
Rubinstein, J.	102.20	1,000.00	102,200.00
Sanchez, J.	11.30	525.00	5,932.50
Rush, M.	64.00	825.00	52,800.00
Martinez, S.	1.20	350.00	420.00
Bonesteel, A.	2.30	400.00	920.00
Gaske, A.	1.80	332.50	598.50
Gaske, A.	59.80	665.00	39,767.00
Leveridge, R.	35.60	1,600.00	56,960.00
Ogrey, S.	5.10	265.00	1,351.50
Farra, A.	9.00	775.00	6,975.00
Sraders, S.	57.30	725.00	41,542.50
Kaminsky, E.	3.50	665.00	2,327.50
Turner, C.	19.00	225.00	4,275.00
Hubbard, B.	9.70	500.00	4,850.00
Huddleston, D.	9.20	525.00	4,830.00
Agwu, I.	44.30	525.00	23,257.50
Poz, N.	14.50	350.00	5,075.00
Dougherty, J.	12.20	825.00	10,065.00
<b>TOTALS</b>	<b>503.40</b>		<b>\$ 408,732.00</b>

#### TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	3.30	742.50
A008	Hearings	1.20	1,740.00
A009	Meetings / Communications with AHC & Creditors	8.10	12,630.00
A015	Non-Working Travel (Billed @ 50%)	22.70	11,048.50
A019	Plan / Disclosure Statement	2.00	3,900.00
A020	Insurance Adversary Proceeding	466.10	378,671.00

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## EXPENSE DETAILS

### E107: Delivery Services/Messenger

Date	Description	Task	Amount
1/09/23	Messenger & Delivery, United Parcel Service / Reed Smith LLP / 1/09/23	E107	44.19
1/09/23	Messenger & Delivery, United Parcel Service / Reed Smith LLP / 1/09/23	E107	11.66
<b>Sub-Total of Expenses:</b>			<b>\$ 55.85</b>

### E110: Out-of-Town Travel

Date	Description	Task	Amount
1/10/23	Travel - Mileage / Jason Rubinstein / Stamford, CT / Attend Deposition / January 9-10, 2023 (649 miles @ \$0.625/mile)	E110	405.63
1/10/23	Travel - Tolls / Jason Rubinstein / Stamford, CT / Attend Deposition / January 9-10, 2023	E110	9.61
1/10/23	Travel - Parking / Jason Rubinstein / Stamford, CT / Attend Deposition / January 9-10, 2023 / Parking @ hotel	E110	18.08
1/10/23	Travel - Lodging / Jason Rubinstein / Stamford, CT / Attend Deposition / January 9-10, 2023	E110	313.95
1/10/23	Travel - Meals / Jason Rubinstein / Stamford, CT / Attend Deposition / January 9-10, 2023 / Two meals - breakfast & supper	E110	36.42
1/12/23	Travel - Train Fare / Jason Rubinstein / Travel (Roundtrip / Coach fare) Washington, DC to Stamford, CT / Attend Deposition / January 12, 2023	E110	331.00
1/12/23	Travel - Train Fare / Alison Gaske / Travel (One-way / Coach fare) from Washington, DC to New York NY / Attend deposition / 01/11-12/2023	E110	185.00
1/12/23	Travel - Parking / Jason Rubinstein / Stamford, CT / Attend Stevens Deposition / January 12, 2023 / Parking @ Union Station, Washington, DC	E110	25.00
1/12/23	Travel - Lodging / Alison Gaske / New York NY / Attend deposition / 01/11-12/2023 (1 night)	E110	243.33
1/12/23	Travel - Meals / Jason Rubinstein / Stamford, CT / Attend Deposition / January 12, 2023	E110	10.11
1/12/23	Travel - Meals / Alison Gaske / New York NY / Attend deposition / 01/11-12/2023 (1 meal)	E110	42.08
<b>Sub-Total of Expenses:</b>			<b>\$ 1,620.21</b>

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**E115: Deposition Transcripts**

<b>Date</b>	<b>Description</b>	<b>Task</b>	<b>Amount</b>
11/28/22	Deposition / Transcript / Veritext / Video deposition on 2022.11.17	E115	1,294.13
12/12/22	Deposition / Transcript / Veritext / Transcript of deposition on 2022.11.17	E115	1,527.80
12/30/22	Deposition / Transcript / Veritext / Exhibit share for deposition on 2022.11.09	E115	295.00
12/30/22	Deposition / Transcript / Veritext / Tech Support for deposition on 2022.11.17	E115	262.50
1/16/23	Deposition / Transcript / Veritext / Video Deposition on 2023.01.12	E115	684.00
<b>Sub-Total of Expenses:</b>			<b>\$ 4,063.43</b>

**E118: Litigation Support Vendors**

<b>Date</b>	<b>Description</b>	<b>Task</b>	<b>Amount</b>
1/06/23	Contracted Professional Fees / Cobra Legal Solutions LLC / Tech/User License/ Hosting: Nov. 2022	E118	1,142.82
<b>Sub-Total of Expenses:</b>			<b>\$ 1,142.82</b>

**TOTAL EXPENSES** **\$ 6,882.31**

**TOTAL FEES AND EXPENSES** **\$ 415,614.31**